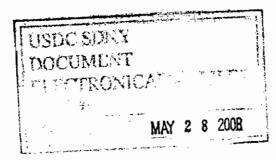
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May 27, 2008

VIA HAND DELIVERY

Judge Laura Taylor Swain United States District Court United States Courthouse 500 Pearl Street, Room 755 New York, New York 10007



Re: Chadwick McQueen, et al. v. Clothing Company S.p.A., et al., Case No. 08 Civ. 3019 Joint Request for Extension of Deadlines

Dear Judge Swain:

This firm represents Plaintiffs Chadwick McQueen and The Terry McQueen Testamentary Trust ("Plaintiffs") in <u>Chadwick McQueen</u>, et al. v. <u>Clothing Company S.p.A.</u>, et al., No. 08 Civ. 3019 (LTS)(RLE) (the "Action").

We write to inform the Court that Plaintiffs and Defendants Clothing Company S.p.A., Belstaff USA Corp., and Belstaff International Ltd. ("Defendants") are very close to settling the Action and are currently finalizing a settlement agreement. However, Plaintiffs and Defendants are also aware that certain deadlines are approaching regarding Your Honor's Initial Conference Order, dated April 1, 2008 and filed on April 2, 2008 (the "Order"), as well as Plaintiffs' deadline to respond to Belstaff International Ltd.'s motion to dismiss for lack of personal jurisdiction pursuant to Fed. R. Civ. P. 12(b)(2), filed on May 15, 2008.

Specifically, the Order requires that:

- (1) A pre-trial conference shall be held on Friday, June 27;
- (2) The parties shall confer on the matters set forth in sections 3(a)-(l) of the Order by Friday, June 6; and

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(3) The parties shall file with the Court a Preliminary Pre-Trial Statement on the matters set forth in sections 4(a)-(r) of the Order by Friday, June 20.

In addition, pursuant to Local Civil Rule 6.1(b), Plaintiffs must file their opposition to Belstaff International Ltd.'s motion to dismiss by Monday, June 2.

Counsel for Plaintiffs and Defendants have conferred about these upcoming deadlines, and have agreed that, in order to promote settlement while incurring minimal costs, such deadlines should be tolled for at least thirty (30) days. Plaintiffs therefore respectfully request that the Court:

- (1) Reschedule the June 27 pre-trial conference to take place at a date no earlier than Monday, July 28, 2008, which would correspondingly shift the dates provided in sections 3 and 4 of the Order to take place at least thirty days later than under the current schedule imposed by the Order; and
- (2) Extend Plaintiffs' deadline to file its opposition to Belstaff International Ltd.'s motion to dismiss to Wednesday, July 2, 2008.

Defendants' counsel has read this letter and has confirmed its approval of these requested extensions. We appreciate the Court's attention to this matter.

Respectfully submitted,

The requests are granted. The confrance is rescheduled to August 15,2008, at 3:30pm

SO ORDERED.

STATES DISTRICT JUDGE

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